

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

July 1, 1994

Mr. Tom Hudson
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98119-3958

Re: Compliance Status Report - June 20, 1994

Dear Mr. Hudson,

The compliance status report of June 20, 1994 requested an analysis of particulates deposited on vehicles parked on the north side of South Nevada Street and a report of corrective action addressing this problem.

As per your request an analysis, limited because of sample size, was performed and the results (attached) indicate it is most likely road dust or a soil type material and were not consistent with a cement or clinker type material. In the future, should a larger sample 1-2 grams be collected, Ash Grove will gladly assist you in conducting additional tests.

We believe that the Seattle Plant is not the source of this problem. There are many fugitive sources in the vicinity and all contribute to the deposition of sand/soils on the roof of the Port Terminal #106. Some contributors are East Marginal way traffic, batch plant, port traffic in addition to vehicular and costumer traffic in our plant. The port's roof itself could be considered a source since it accumulates material with time over its large area and deposits this material during dry weather and a north wind in the concentrated area you observed.

Despite our belief, Ash Grove has expended a large effort to reduce whatever contribution we do have including enclosing the clinker pan conveyer, purchasing a water truck which and along with road sweepers is used to maintain our paved roads clean, offering the use of our wash rack facility to employees of adjacent businesses, keep doors and openings closed in our process buildings and maintaining dust collectors to insure efficient filtration. We have also prepared plans to clean the ports roof at our sole expense. This will occur as weather permits. These actions are taken with the good neighbor spirit in mind.

As you observed on June 20, the source of the problem could not be determined and as you mentioned there were no visible emissions coming from our plant at the time. To the benefit of our immediate neighbors and community, Ash Grove Cement Company has taken expensive steps, many of them voluntary, to keep it that way. The management and the employees of the Seattle Plant are proud of our efforts and record. It disappoints us that we are unfairly suspected whenever your agency is contacted by our neighbors.

Please call me if you should have any questions.

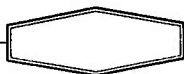
Yours truly,



Gerald J. Brown
Manager, Safety and Environmental

cc: K. Rone
E. Pierce
Hans Steuch

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"WESTERN REGION"

3801 EAST MARGINAL WAY, SOUTH • SEATTLE, WA 98134 • PLANT OFFICE: (206) 623-5596 • FAX: (206) 623-5355

Inter-Office Memorandum

Date June 21, 1994

To Jerry Brown

From Patrick Noon

Copies to Ken Rone

Subject PSAPCA

A Mr. Tom Hudson of PASPCA collected a very small sample of an undetermined dust from the Hasbro site next to the Ash Grove Cement Seattle plant. The material had a granular dust appearance. Since it was such a small sample, we were limited in the analytical tests we could conduct. We determined an insoluble residue test, of which a low value indicates the material has been through a cement kiln. The high amount of insoluble material indicates that it is a road dust or a soil type material. A typical insoluble concentration on clinker or finished cement is 0.25% or less. The sample weight and insoluble concentration is listed below.

Sample #
Date Recd
Sample Weight
Insoluble %

0862-94
June 20, 1994
0.0887 grams
22.2%